

# EXHIBIT T

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

NATALIE REESER,

Plaintiff,

Hon. George Caram Steeh  
Case No. 2:14-cv-11916

v.

HENRY FORD HOSPITAL,

Defendant.

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MILLER COHEN, P.L.C.  
Keith D. Flynn (P74192)  
Attorney for Plaintiff  
600 W. Lafayette Blvd., 4th Floor  
Detroit, MI 48226  
313-964-4454  
kflynn@millercohen.com

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VARNUM LLP  
Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48375  
248-567-7828  
tjmiglio@varnumlaw.com  
bebuchanan@varnumlaw.com

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**DEFENDANT'S SECOND SET OF INTERROGATORIES TO PLAINTIFF**

**PLEASE TAKE NOTICE** that pursuant to FRCP. 33, you are hereby required to answer, in writing and under oath, each and every one of the Interrogatories set forth below within thirty (30) days after service hereof.

The information sought must be given whether secured by you, your agent, your representative or attorney, or any other person who has made this knowledge known to you or from whom you can get this information and who is competent to testify as to the facts stated.

The Interrogatories herein shall be deemed continuing, and supplemental answers shall be required within fifteen (15) days of the receipt by you, either directly or indirectly, of further or different information from the time the answers hereto are served.

### **DEFINITIONS AND INSTRUCTIONS**

A. As used herein, "document" or "documents" includes, without limitation, the complete original and/or non-identical copies of any written or graphic matter, no matter how produced, recorded, stored (*i.e.* electronically or hard copy), or reproduced, including, but not limited to, any writing; letter; envelope; electronic mail; electronic message sent by a portable, hand-held cellular device (such as a Blackberry or iPhone); meeting minute; memorandum; statement; book; record; study; handwritten note; note of an oral conversation; working paper; chart; graph; data sheet; data processing card; printout; microfilm; index; appointment book; calendar; diary; diary entry; telephone message slip; voice recording; tape; inter- and intra- office communications; interview or communication note; or any other data compilation in Plaintiff's possession, custody, or control, including all drafts of such document or documents.

B. As used herein, "you," "your," "Plaintiff," or "Plaintiff's" means Natalie Reeser, and her agent(s) or representative(s).

C. As used herein, "Defendant" means Henry Ford Health System, its

members, parent corporations, affiliates, subsidiaries, divisions, partners, predecessors, successors and assigns, including, without limitation, any past and present officers, directors, shareholders, employees, agents, representatives and attorneys of any of the foregoing (“Henry Ford Health System”).

D. With regard to Plaintiff’s responses to these Interrogatories, each response should relate to all time periods relevant to the Complaint, and when the response is for a different time period, the response should so indicate.

E. If Plaintiff objects to any part of an Interrogatory, set forth the basis of the objection and respond to all parts of the Interrogatory to which there is no objection.

F. If any Interrogatories are objected to on the basis of privilege, provide for each such Interrogatory a statement of the claim of privilege and all facts relied on in support thereof.

**INTERROGATORIES**

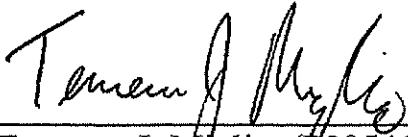
**INTERROGATORY NO. 7**

For the time period of January 1, 2014 to present, state your current address and list any previous addresses, indicating the dates you resided at each of those addresses, and the date you moved to your current address.

**ANSWER TO INTERROGATORY NO. 7**

Respectfully submitted:

VARNUM LLP

By: 

Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
Attorneys for Defendant  
39500 High Pointe Blvd., Ste. 350  
Novi, MI 48075  
(248) 567-7828

Dated: February 24, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of February, 2015, I caused the foregoing documents to be served upon all parties of record by placing said documents in an envelope with proper postage affixed thereto and placing same in the U.S. Mail.

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Joanne E. Demers, ACP

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